THE QUALITY CHICKEN PEOPLE

ALLEN FAMILY FOODS, INC.
P.O. Box 63
18752 HARBESON RD.
HARBESON, DE 19951
302/684-1640 FAX: 302/684-1638

January 13, 2010

Mr. Glenn F. Davis, Program Manager
Department of Natural Resources and Environmental Control
Division of Water Resources
Surface Water Discharges Section
89 Kings Highway
Dover, Delaware 19901

Re: Compliance Sampling & Inspection (CSI) – October 14, 2009
NPDES Permit No. DE-0000299 – Revised Letter

Dear Mr. Davis:

Allen Family Foods, Inc. is in receipt of your letter dated October 15, 2009 that was received by us on November 21, 2009 in regard to the referenced Compliance Sampling & Inspection (CSI). We are also in receipt of your hand written comments to our response letter dated December 14, 2009. Please accept the following as our response to the findings of the inspection and your comments to our letter.

1. The composite sampler is set up to sample over a 24 hour period starting at midnight and ending the following midnight. This procedure was implemented in December, 2008 when it was determined that our sample time of 6:00 a.m. Tuesday to 6:00 a.m. Wednesday did not coincide with the flow which is measured from midnight to midnight. This was documented in a memo to Nancy Kraus and Jeff Bailey dated December 15, 2008 (see attached).

   When the sampler is set up ice is a standard procedure to ensure the temperature requirements of the sample being collected. At the time of the split sampling for the CSI the sample was collected for EnviroCorp Labs to analyze and placed in the refrigerator for pick up the next day. The remainder of the sample was left in the sampler for Chris Cleaver to pick up the next

day. The ice had melted by the time Mr. Cleaver arrived to pick up the sample causing the temperature of the sample to be above the acceptable limit. The sampler was set up for a second sample with additional ice to ensure the sample would be acceptable for pick up the next day.

A written procedure for sampler set-up, operation and sample collection has been used as a training document for all employees to be trained with their signature acknowledging the training (see attached documentation).

2. A revised procedure for verifying the composite sampler aliquot has been developed to meet the requirements outlined in your letter. The sheet has been developed that will show the volume of at least 4 samples and the average of those samples to be reported. The new sheet has been set up to show the operator performing the procedure and includes a signature and date. This revised procedure was implemented for the December, 2009 aliquot verification and will continue as required (see attached documentation).

3. A Hach DR-890 colorimeter is used for the daily chlorine residual testing required under our permit. At the time of the CSI it was noted that our DR-890 cell that holds the small glass test tubes was not as clean as it should be. Your letter also states that our glass tubes were very dirty. It is our practice to clean these test tubes after every use and replace them if they become discolored or scratched. I contacted Hach regarding the cleaning procedures for the colorimeter and they stated that glass cleaner should be used with the wiping of the inside to be done with a laboratory grade "Kimwipe" to ensure that lint will not be left in the cell during the cleaning process. This procedure has been documented and implemented and new test tubes have been ordered (see attached documentation).

4. As stated in your letter, Mr. Chris Cleaver arrived at the Harbeson wastewater plant on October 15th to pick up the composite sample to be split with EnviroCorp Labs. At this time Mr. Cleaver noticed that our effluent "was cloudy and did not look normal." After investigation by our staff it was determined that due to heavy rainfall in the area (1.4 inches measured) our storm water holding tank was overflowing and mixing with the final effluent from the treatment plant. It was discovered that the drain valve in the tank was plugged. By exercising the valve, the plug disappeared and the tank immediately began to drain stopping the overflow to the final effluent.

In the future, to prevent occurrences of this nature, regular checks of the storm water tank are being made during rain events. This will be documented in the plant operating log. Also, the drain valve is kept in a full open position minimizing the chance of plugging. No further problems have been experienced since the event of October 15th and there have been several rain events.

If you should have any questions, please let me know.

Respectfully submitted,
ALLEN FAMILY FOODS, INC.

Michael R. Sausé
Wastewater Manager

Cc: Tom Brinson, Corporate Environmental Manager
Rob Bacon, Senior Wastewater Manager

December 15, 2008

To: Nancy Kraus
Jeff Bailey

From: Michael Sausé

Subject: Sample Set Up

During our recent inspection by DNREC it was brought up that our sampling schedule of 0600 Tuesday to 0600 Wednesday does not coincide with the flow that we are reporting which is the flow from midnight to midnight.

We have to change one or the other to get them synchronized. I would like the sampler to be set up tonight at midnight and shut down the following midnight. That would be a Tuesday sample with a flow that would match. If there are no problems with this change please consider it permanent.

Oil and Grease samples will still be taken on 1st shift at the scheduled times that we have always used.

Chris Brinson said he would try and get the ice on his shift just in case it is not available at midnight.

Thanks,
Michael Sausé
Wastewater Manager

January 8, 2010

To: Allen's Harbeson Wastewater Staff

From: Michael Sausé

Subject: Composite Sampler Set Up and Run Procedure

It is required that we sample our effluent for the parameters noted in the NPDES permit. Most of the sampling requirements are based on a composite sample taken over a 24 hour period. To accomplish this, on a weekly basis the composite sampler is set up on Tuesday at midnight and is taken off line on Wednesday at midnight. The procedure for setting up the Sigma composite sampler is as follows:

1. Obtain ice from the ice house and bring to the sampler which is located at the end of the chlorine contact chamber. Take the top off of the sampler and place the ice in the bottom of the sampler.

2. Inspect the suction tube to ensure that it is clean and there is no algae buildup. Replace tubing if necessary. It is stored in the shed behind the wastewater building.

3. Complete the required information on the Chain of Custody sheet starting with the time of sampler set-up.

4. Place the sample container in the center of the sampler over the ice.

5. Place the top of the sampler over the sample container. Ensure that the sample delivery tube goes into the sample container.

6. Snap and secure the sides of the top to the bottom of the sampler.

7. Hit Power. Hit Run. Hit Enter.

8. Collect sample at the end of the run time which is Wednesday at midnight.

9. Record on the Chain of Custody the time the sampler is taken off line.

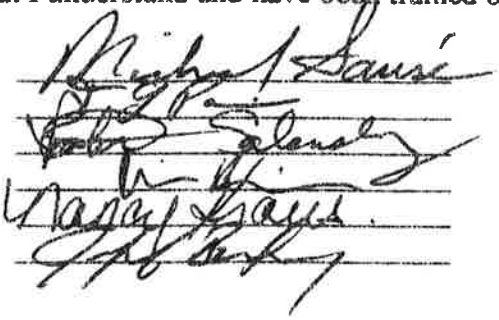
10. Shake the sample and transfer into the EnviroCorps sample containers.

11. Refrigerate all samples.

12. Complete all other information that is required on the Chain of Custody Sheet.

I acknowledge that I understand and have been trained on the above procedures.

Michael Sausé
Tom Paine
Robert Salensky
Chris Brinson
Nancy Kraus
Jeff Bailey



January 11, 2010

To: Allen's Harbeson Wastewater Staff

From: Michael Sausé

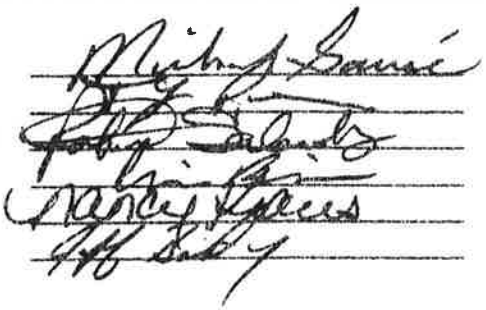
Subject: Composite Sampler Aliquot Verification Procedure

It is required that we verify the volume of the aliquot sample collected by the Sigma sampler on a monthly basis. This procedure is documented below for the purposes of training and sample verification.

1. A 1000 ml graduated cylinder will be required for aliquot sample verification.
2. Go to the composite sampler and plug it in.
3. Remove the top cover from the sampler.
4. Place the 1000 ml graduated cylinder on a level surface.
5. Remove top of the sampler and place discharge line in the graduated cylinder.
6. Push manual operation on the sampler key pad.
7. A grab sample will come up that should measure 100 ml.
8. Push Enter.
9. Repeat 4 times and record the volume of each sample on the Sampler Aliquot Verification sheet. Record all information requested for that sample verification procedure.

I acknowledge that I understand and have been trained on the above procedures.

Michael Sausé
Tom Paine
Robert Salensky
Chris Brinson
Nancy Kraus
Jeff Bailey



SIGMA SAMPLER ALIQUOT VERIFICATION

	Date	Samples Taken	Volume of Sample	Initials of Person
Dec. '09	12-4	4	100 mL 100 mL 100 mL 100 mL	TJ Pain
Jan. '10	1-9	4	100 mL 100 mL 100 mL 100 mL	TJ Pain
Feb. '10				
Mar. '10				
Apr. '10				
May '10				
Jun. '10				
Jul. '10				

Aug. '10

Sep. '10

Oct. '10

Nov. '10

Dec. '10

January 11, 2010

To: Allen's Harbeson Wastewater Staff

From: Michael Sausé

Subject: Hach DR/890 Colorimeter Cleaning Procedure

A Hach DR/890 colorimeter is used for testing and reporting chlorine residual for the final effluent on a daily basis as required in the Discharge Monitoring Report. It is necessary to keep the instrument clean inside and outside. It is also required to maintain glassware that is clean and free of scratches.

1. Inspect the colorimeter for cleanliness inside and out. Also inspect the glassware being used for cleanliness, absence of scratches and stains.

2. If the colorimeter is in need of cleaning (usually once per week) it the manufacturer's recommendation that glass cleaner be used with a Kim Wipe used for the application of the cleaner.

3. Gently clean the inside of the cell where light is generated and passes through the glassware.

4. Run the chlorine residual test in accordance with procedures in the owner's manual.

5. Thoroughly wash and rinse the glassware when testing is complete.

I acknowledge that I understand and have been trained on the above procedures.

Michael Sausé
Tom Paine
Robert Salensky
Chris Brinson
Nancy Kraus
Jeff Bailey